

FILED
IN CLERKS OFFICE

2022 JUN 30 PM 12:50 UNITED STATES DISTRICT COURT

for the

District of Massachusetts

Eastern Division

Case No. 1:22-cv-10473

MICHAEL BUSH
Pro Se Plaintiff

VS.

THE WANG CENTER FOR THE
PERFORMING ARTS, INC. d/b/a Boch Center
Defendant

**PLAINTIFF'S MEMORANDUM OF REASONS IN
SUPPORT OF MOTION FOR LEAVE TO FILE REPLY**

In accordance with Local R. Civ. P. 7.1(b)(1), the Plaintiff hereby submits this memorandum of reasons in support of his attendant motion. The certificate of service and Local Rule 7.1 certification are in the motion itself.

The proposed Reply will assist the Court in resolving the Plaintiff's motion to compel the Defendant to provide initial disclosures, engage in the requisite Fed. R. Civ. P. 26(f) conference, respond to discovery requests, and comply with Local R. Civ. P. 7.1(a)(2) by enabling the Plaintiff to respond to points raised in Defendant's Opposition which were not addressed in the Plaintiff's initial motion, including (1) the notion that case law overrides rules of civil procedure, (2) the interpretation of Fed. R. Civ. P. 26(f), (3) the Defendant's accusation that the Plaintiff

violated Local. R. Civ. P. 7.1, and (4) the Defendant's misapplication of case law and Fed. R. Civ. P. 26(b)(2)(C)(iii) to argue that all discovery should be stayed.

The Plaintiff requested and received the Defendant's assent to file this motion unopposed. (See Exhibit 1 enclosed.)

This Court recently granted the Defendant's opposed motion for leave to file a 10 page reply in support of its already voluminous motion to dismiss. Here, the Plaintiff moves for leave to file merely a four page reply in support of his much shorter motion to compel discovery and attendant memorandum of reasons.

For these reasons, the Plaintiff requests this Court grant his motion for leave to file a four page reply within seven days of the entry of its order.

June 28, 2022

Respectfully submitted,

Michael Bush, Pro Se

Michael Bush
280 Lowell Street
Carlisle MA 01741
Bmoc54@verizon.net
Phone: (978) 734-3323

Exhibit 1

Subject: RE: Assent to a Reply? | Bush v. Wang Center

From: Tavares, Kelsey - To: bmoc54@verizon.net - Cc: Falby, Bruce E. - Date: June 28, 2022 at 12:43 PM

Mr. Bush,

Although we think the issue is clear, we will not oppose a motion for leave to file a reply.

Thanks,
Kelsey

From: Mike Bush <bmoc54@verizon.net>
Sent: Tuesday, June 28, 2022 12:24 PM
To: Tavares, Kelsey <Kelsey.Tavares@us.dlapiper.com>
Cc: Falby, Bruce E. <Bruce.Falby@us.dlapiper.com>
Subject: Assent to a Reply? | Bush v. Wang Center

 EXTERNAL MESSAGE

Hi Kelsey,

I'm addressing this to you and Cc'ing Bruce as you seem to have been engaging in most of the correspondence regarding this case. But if you would prefer otherwise, please let me know.

In a Reply not exceeding five pages, I'd like to address a few issues not appearing in my motion to compel discovery which the defendant raised in its opposition. Do you assent on the defendant's behalf to a motion for leave to file such a reply?

Kind Regards,
Mike Bush
280 Lowell Street
Carlisle MA 01741

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